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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., *et al.*,

Debtors.

Case No. 08-35653-KRH
Chapter 11
Jointly Administered

**RESPONSE AND OPPOSITION BY JUBILEE-SPRINGDALE, LLC TO
LIQUIDATING TRUST'S SIXTY-FOURTH OMNIBUS OBJECTION TO
LANDLORD CLAIMS SEEKING TO AMEND CLAIM 8282**

Jubilee-Springdale, LLC ("Jubilee"), by counsel, in response to the *Liquidating Trust's Sixty-fourth Omnibus Objection to Landlord Claims* (the "Objection"), does hereby oppose and respond, as set forth below:

1. Circuit City Stores, Inc. and certain of its affiliated entities (collectively, "Debtors") filed a petition for relief on or about November 10, 2008 ("Petition Date") and continued to operate as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108. On September 14, 2010, the Court entered an order confirming the *Modified Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Unsecured Creditors Holding General Unsecured Claims* [Docket No. 8555] (the "Plan of Liquidation").

Pursuant to the Plan of Liquidation, the Circuit City Stores, Inc., Liquidating Trust was established and Alfred H. Siegel was appointed Trustee (the “Trustee”).

2. On September 28, 2012, the Trustee filed the Objection [Docket No. 12446].

3. A review of the Objection shows the Trustee’s attempt to amend and reduce Claim No. 8282 filed by Wells Fargo Bank as Trustee for the Registered Holders of JP Morgan Chase Commercial Mortgage Securities Corp. Commercial Mortgage which appears to concern the debts owed to Jubilee.

4. On or about May 1, 2009, Jubilee filed a proof of claim, number 12771 (the “Jubilee Claim”), amending claim number 9248 and setting forth a general unsecured claim in the amount of \$759,541.86 representing sums due under the Circuit City Stores, Inc.’s (and/or its affiliates and subsidiaries, referred to collectively as the “Debtors”) lease with Jubilee and rejection damages due under that lease.

5. Jubilee objects to the extent that the Objection to Claim No. 8282 seeks to alter the Jubilee Claim or any claim based upon the Debtors’ obligations to Jubilee.

WHEREFORE, Jubilee respectfully requests that this Court deny the relief requested in the Objection as it relates to the Jubilee Claim in its entirety; require the Trustee to amend the erroneous classification of the claim; and grant such other and further relief as is just and proper.

Dated: Richmond, Virginia
November 12, 2012

Respectfully submitted,

/s/ Jeremy S. Williams

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 12, 2012, a true and exact copy of the foregoing was served via ECF notification to the following:

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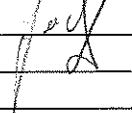
/s/ Jeremy S. Williams
Counsel

DECLARATION

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that to the best of my knowledge the foregoing is true and correct.

Dated: November 2, 2012

JUBILEE-SPRINGDALE, LLC

By: 
Name: Todd Korman
Title: Executive Vice President & Gen. Counsel